

# United Learning Non-Employee Data Protection Policy (Privacy Notice)

## Scope

The policy and procedure set out in this document applies to all United Church Schools Trust (UCST) and United Learning Trust (ULT) non-employees; including peripatetic teachers, members of the local governing body, contractors, volunteers and agency staff. The two companies (UCST and ULT) are referred to in this policy by their trading name, 'United Learning'.

This policy is a privacy notice for non-employees and has been updated to ensure it complies with the requirements of the General Data Protection Regulation and associated data protection laws. United Learning's Group Data Protection Policy can be viewed on the Data Protection page on the United Hub.

Where this policy refers to 'School' or 'Head Teacher', within Central Office this should be interpreted to refer to the department where a member of staff works and their Head of Department.

As a values-led organisation our values of ambition, confidence, creativity, respect, enthusiasm and determination are key to our purpose and underpin all that we do.

## 1. Responsibility for Data Protection

1.1 As part of its everyday activities as a place in which you provide work or services, United Learning will use or "process" personal data about you. This policy sets out what personal data we will collect, the purposes for which it is processed and who we may share personal data with.

1.2 The Data Controller for all personal information held by UCST (central office staff and Independent School staff) is UCST. UCST is registered with the Information Commissioner's Office (ICO). The registration number is Z53307X.

The Data Controller for all personal information held by ULT (Academy School staff) is ULT. ULT is registered with the Information Commissioner's Office (ICO). The registration number is Z7415170.

The Data Protection Officer for United Learning is Steve Whiffen. He is responsible for ensuring that the Group complies with Data Protection Law. He can be contacted on [company.secretary@unitedlearning.org.uk](mailto:company.secretary@unitedlearning.org.uk) or on 01832 864538.

## 2. The Categories of personal data held by the Group about non-employees are

2.1 Contact details: Names, address, telephone numbers, email addresses and other contact details;

2.2 Recruitment: information in application forms, references, psychometric tests; equal opportunities monitoring; etc.

2.3 Safeguarding checks: The single central record will contain your name, address, DOB, details about the role you perform within the school, start date, details of ID provided such as



passport numbers and driving licence numbers, qualification checks, teacher number if applicable, notes regarding outcomes of Barred list checks, DBS checks, right to work in UK checks, names of referees and details of any safeguarding training received.

- 2.4 Safeguarding of pupils: safeguarding records, administration or investigation meetings.
- 2.5 General HR administration: attendance records; health and safety accident reports; etc.
- 2.6 Education and training: education and training records;
- 2.7 Communication: details in internal directories and newsletters; etc.
- 2.8 Security: details for pass cards; references; CCTV images; voice recordings; DfE List 99 and Police Checks; the results of Disclosure and Barring Service checks

**We also process the following special categories of personal data:**

- 2.9 Ethnicity
- 2.10 Medical information where this relates to your role within the school.

**3. The legal basis on which we process this information is:**

The legal basis for processing the personal data listed in points 2.1-2.8 above are:

- to enable us to fulfil the terms of your contract or licence for services
- to enable us to comply with our legal obligations
- where the processing is necessary for the purposes of United Learning's legitimate interests as defined in the GDPR.

We will only process the special categories of personal information listed in points 2.9 – 2.10 to fulfil our employment law obligations, including compliance with the Equality Act 2010, or, where necessary, for the purposes of occupational medicine, to assess your working capacity.

**4. What will United Learning do with the personal data that we collect**

- 4.1 Any information held about you will be held securely on file, (either computer or paper-based) and used only for the purposes described in this document. United Learning will use your personal data to:
  - Carry out equal opportunities monitoring;
  - Carry out general personnel administration: attendance records; medical reports and records; health and safety accident reports;
  - Keep records of any education and training that you have completed;
  - Maintain internal staff telephone and email directories;
  - Communicate with you via electronic methods including email and through newsletters;
  - Create pass cards;
  - To carry out our legal obligations to carry out Disclosure and Barring Service Checks (DBS); DfE List 99 and Police Checks; and to confirm that you are entitled to work in the UK;
  - Receive and provide references from past and to future employers;
  - To obtain appropriate professional advice and insurance;



- To monitor appropriate use of our IT systems in accordance with the Acceptable Use Policy.
- To respond to a request from you regarding your rights under data protection legislation.
- For management planning and forecasting.
- For statistical research and analysis.
- To keep recruitment records and track applicant progress.
- To make use of personal data in aggregate to provide insights into effective school improvement.

## 5. Data Retention Periods

We will keep your HR file until seven years after you finish attending the school. For details regarding retention periods for specific data such as records of disciplinary proceedings please refer to the Records Retention Schedule for your school.

## 6. Data Processors

We use third party data processors to provide us with a management information system, accounts software, cloud storage services, apps and software for use in the classroom and to facilitate the secure transfer of data between the school and central office. This use of data processors will only take place if it is in compliance with the Data Protection Act 1998 and the General Data Protection Regulation.

Decisions on whether we contract with these third party processors are subject to a robust approval process and are based on a detailed assessment of the purpose for which the data processing is required, the level and sensitivity of data involved and the arrangements in place to store and handle the data. To be granted access to pupil level data, data processors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

A full list of the data processors used by central office and your school can be found at Annex A. This list will be reviewed and updated on an annual basis.

## 7. Sharing Data with third parties (other data controllers)

We will not share your personal data with anyone unless you have asked us to do so or the law and our policies allow us to do so. A list of the data controllers that we share personal information with can be found at Annex B. This list will be reviewed and updated on an annual basis.



## 8. Your rights as data subject

Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights please write to your Head Teacher or the Group Data Protection Officer Steve Whiffen.

### Right of access to personal data “subject access request”

You have the right to access the personal data that the school holds about you. Requests need to be made in writing. We take the security of personal data seriously so we may ask you for proof of identity to verify that you are entitled to the information requested.

### Right to withdraw consent

Where we have obtained your consent to specific processing activities you may withdraw this consent at any time.

### Right to rectification

You have the right to have the personal data that we hold about you rectified if it is inaccurate or incomplete. We will respond to such requests within one month.

### Right to erasure

You have the right to have personal data erased in certain specific circumstances. If you make such a request we will consider whether the right to erasure applies and give you a full and reasoned response.

### Right to restrict processing

In certain circumstances you have the right to request that we restrict the processing of your personal data. If you make such a request we will consider whether the right to restrict processing applies and give you a full and reasoned response.

For further information regarding these rights please refer to the Group’s rights of the data subject policy which is available on the Data Protection page on United Hub.

If you have any concerns regarding the processing of your personal data please contact the Data Protection Officer, Steve Whiffen, on 01832 864538 or [company.secretary@unitedlearning.org.uk](mailto:company.secretary@unitedlearning.org.uk). You can also talk to the Information Commissioners Office on 0303 123 1113 or <https://ico.org.uk/for-the-public/>.

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UCST/ULT/Both:	Both	Reason for version change:	GDPR 2018
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Authorised by:	United Learning SLT		



## Annex A

### Data processors used by United Learning

Data Processor	Type of information held
Bond	HR records
PSF	Current General Ledger
Access	New General Ledger
Isams	UCST schools management information software
Networkx Applicant tracking system	On-line recruitment
Mircrosoft Office 365	Productivity tools e.g. email and word processing
Educare Online	Online Safeguarding training provider
Safety Learning online	Online Health & Safety training provider
Newsweaver / Populo	Newsletter software
IMASS	Occupational Health
Ipsos Mori	Staff survey



## Annex B

### Data controllers with whom we share personal data

#### Accounts Information

We are required by the Companies Act 2006 and Charities Act 2011 to have our accounts audited annually. As part of this process, payments to non-employees is shared with the external auditors. Our current auditors are Grant Thornton LLP.

#### School Inspections

ISI may have access to information about non-employees during school inspections.

